

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

HUGO MEDELLIN

Plaintiff,

v.

ARION MORSHEDIAN and SPACE
EXPLORATION TECHNOLOGIES
CORP.

Defendants.

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CIVIL ACTION NO. 1:22-cv-00084

DECLARATION OF ARION MORSHEDIAN

My name is Arion Morshedian. I am over the age of 21 and am in all ways competent to make this declaration on personal knowledge.

1. I am a Structures Engineer II for Space Exploration Technologies Corporation (“SpaceX”). I have been employed as an engineer for SpaceX since shortly after I graduated from Johns Hopkins University in 2020.
2. I had a 3.9 GPA at Johns Hopkins and graduated near the top of my mechanical engineering class. I was on scholarship and was involved in numerous engineering activities.
3. I participated in driver training and obtained my driver’s license in California in 2014, when I was 16 years old. Doing so required written and driving examinations. I maintained a valid and current driver’s license before and after the accident. A true and correct copy of my driver’s license, which was valid at the time of the accident, is attached as Exhibit 6 to SpaceX’s Motion for Summary Judgment.
4. When I was hired by SpaceX in August 2020, I initially worked at Starbase, which is located in Boca Chica, Texas.
5. While I was temporarily living in Brownville, I was involved in the minor accident at issue in this case on June 11, 2021.

6. Prior to the accident at issue in this lawsuit, I had never been in a traffic accident with another vehicle and only ever had two driving citations in my whole life. Both were minor speeding citations.
7. I had no traffic citations in the six months prior to the accident. A short time prior to the accident in this case, a deer unexpectedly jumped out from the bushes and in front of my car while I was driving one day, which was unavoidable. This happened on State Highway 4 between Brownsville and Boca Chica. I did not break any laws or receive any citations regarding this incident. I was abiding by traffic laws and not speeding when the incident occurred.
8. During the week of June 7, 2021, my personal car was in the shop. On June 9, 2021, I asked Sergio Lara, who oversees some of the vehicles at SpaceX that are sometimes made available for use by SpaceX employees, if I could borrow one of the cars to commute for a few days while my car was in the shop.
9. After Mr. Lara determined a vehicle was available, on June 10, 2021, he let me borrow a Tesla Model 3 for a short period of time. The vehicle was similar to driving my ordinary vehicle, and I was fully capable of driving it. I had also previously driven Teslas on prior occasions and thus had experience with driving Teslas before I borrowed the car.
10. I knew the vehicle I borrowed on June 10, 2021 did not have an autopilot feature enabled in the car and did not rely on it or need it in any way when driving the car.
11. The accident at issue in this lawsuit occurred in Brownsville on June 11, 2021, the day after I borrowed the vehicle and after I had driven a number of miles in the vehicle between Brownsville and Boca Chica multiple times prior to the accident without any problem.
12. When the accident occurred, I was simply commuting to my apartment for the evening. I was not performing any duties for SpaceX nor doing my job at the time. My job was engineering, and driving or commuting was not one of my job duties for SpaceX. No one at SpaceX required me to drive the vehicle or even asked me to drive the vehicle, and no one at SpaceX controlled how, when or what route I drove. I was not doing a mission of any kind for SpaceX when the accident occurred. I was just driving to my apartment.

My name is Arion Morshedian. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27 day of June, 2023.

A handwritten signature in black ink, appearing to read "Arion Morshedian", is written over a horizontal line.

Arion Morshedian